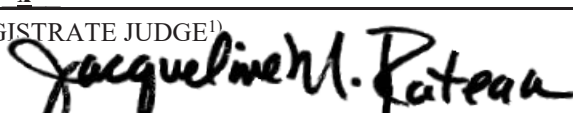


CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Alejandro Acosta DOB: 2002; United States Citizen	DOCKET NO. MAGISTRATE'S CASE NO. 24-12620MJ
Complaint for violation of Title 18, United States Code, § 554(a)	
<p>On or about November 17, 2024, in the District of Arizona, Alejandro Acosta knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: six (6) firearms (Glock and Ruger pistols), thirteen (13) Glock and Ruger pistol magazines, and thousands of rounds of ammunitions of varying calibers, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).</p>	
<p>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</p> <p>On November 17, 2024, Alejandro Acosta attempted to exit the United States and enter the Republic of Mexico through the DeConcini Port of Entry in Nogales, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped a 2010 Chevy Express van bearing Arizona paper plate #YYA58Y driven by sole occupant and registered owner Alejandro Acosta. Acosta was stopped by CBPOs for an outbound inspection. During the inspection, a CBPO canine alerted to the rear bumper area of Acosta's van. During the Primary outbound inspection, Acosta stated that the van he was driving belonged to him, and that he was coming from the Phoenix, Gilbert area enroute to Imoris, Mexico to visit family. The inspecting CBPO asked Acosta if he had any ammunition, weapons, firearms, or more than \$10,000 to declare to which he replied that he did not. Due to the positive canine alert, the CBPO referred Acosta and his van for a Z-Portal scan and secondary inspection. During the Z-portal scan, the CBPO Z-Portal operator noted anomalies in the spare tire area of Acosta's van. During the secondary inspection of the van, CBPO's located six (6) firearms (Glock and Ruger pistols), thirteen (13) Glock and Ruger pistol magazines, pistol grips, speed loaders, an optic cover pin, and thousands of rounds of ammunitions of varying calibers all concealed in the spare tire.</p> <p>In a post-Miranda interview, Acosta admitted that he purchased the firearms in Gilbert, Arizona, for his uncle whom he lives with in Gilbert, Arizona. His uncle instructed Acosta to take the van to Mexico where he would meet an individual who would take him to another location where he would leave the van and its contents. Acosta admitted he knew it was illegal for him to purchase the firearms for someone else and that he understood the firearms purchasing paperwork that he filled out. Acosta further acknowledged that he knew it was illegal to cross ammunition and firearms into Mexico from the U.S. Acosta told agents that he inspected his van prior to leaving for Mexico from Gilbert, Arizona, and that the van was empty. He stated he was the only one with access</p>	
(BASIS OF COMPLAINT CONTINUED ON REVERSE.)	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A	
DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT SELENA M DEACONS <small>Digitally signed by SELENA M DEACONS Date: 2024.11.18 13:52:49 -07'00'</small>
AUTHORIZED BY AUSA <i>R. Arellano</i> <small>RAQUEL ARELLANO Digitally signed by RAQUEL ARELLANO Date: 2024.11.18 12:46:39 -07'00'</small>	OFFICIAL TITLE HSI Special Agent Selena Deacons
Sworn by telephone <input checked="" type="checkbox"/>	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE November 19, 2024

1) See Federal Rules of Criminal Procedure Rules 3, 4.1, and 54

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(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)

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to his van. **Acosta** stated that before he left for Mexico from Gilbert, Arizona, he was worried there were firearms and ammunition in the van because he overheard conversations between his uncle (the one he purchased the firearms for) and an individual in Mexico, whom he was instructed to meet. **Acosta** stated he did not know the firearms were in the van although he realized it once he was stopped for inspection by CBPOs. **Acosta** admitted to agents that he does not have a firearms permit. System checks showed that **Acosta** does not have a firearms license or firearms dealer license on record.

The firearms, ammunition, and magazines found in **Acosta's** vehicle qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. **Acosta** does not possess a license to export weapons or ammunition into Mexico.

(BASIS OF COMPLAINT CONTINUED ON REVERSE.)

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(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)
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